

August 15, 2008

Ms. Laura E. Sinram

Senior Campaign Finance Analyst

Reports Analysis Division

Federal Election Commission

999 E Street NW

Washington, DC 20463

Dear Ms. Sinram:

The National Republican Congressional Committee (FEC ID# C00075820) is in receipt of your Request for Additional Information dated July 16, 2008, regarding our May 2008 monthly report.

Your letter indicates that the Committee disclosed both independent and coordinated expenditures for the same candidates. The Committee complied with all rules and regulations regarding independent expenditures. Committee staff working on independent expenditures are not permitted to have contact about their work with the campaigns, regular Committee staff, or Committee leadership. The filings are correct as filed and meet the standard established by the Commission and the courts.

The Calendar Year-To-Date Per Election for Office Sought amounts for independent expenditures made in connection with the 2008 Special General and 2008 Special Run-off elections for the congressional seat in the first district of Mississippi will be separated by election totals as you indicated in the amendments to be filed by the Committee.

We have reviewed the transactions referenced in your letter for Line 12 of Schedule A, and believe they are correct as filed. The transfer receipt from the Cantor Joint Fundraising Committee is immediately followed by the applicable supporting memo entry listing from Mr. Jonathan S. Perel. The next transfer receipt from the PAC Challenge Committee is immediately followed by the applicable memo entry listing from the Senate Majority Fund. Thus, no amendment is required.

The Committee believes its procedures are in compliance with the best efforts provisions cited in your letter. As an initial matter, all committee solicitations notify the donor that the Committee is required to report occupation and employer information, and request that the donor provide such information. For those donors who choose not to provide the information, the Committee (within thirty days of receiving the contribution) sends the required follow-up letter, which asks the donor again to provide the information, and again advises the donor of the Committee's obligation to report the information. These follow-up letters include a postage-paid return envelope for the donor's convenience. Finally, all such information received, including the contributor's address, is reported.

Any additional information received subsequent to the filing of the original report will be included on the amendments to be filed by the Committee.

With respect to the information that is provided by the donors, the regulations cited in your letter require that we ask contributors to supply employer/occupation information, but do not compel the contributors to comply with the Committee's requests. The Committee has reported all the information it has in its possession in an attempt to satisfy both the intent and the substance of 11 CFR 100.12, 11 CFR 104.3, and 11 CFR 104.7. In addition, the Committee can find no guidance in the statute or regulations that allow it to add to or subtract from information that is voluntarily provided to it from its contributors, nor is there any indication in the statute or regulations that the descriptions referred to are inadequate listings for employer and/or occupation. Finally, the Committee notes that it updates its

employer/occupation data as it is received from donors.

Sincerely:

Keith A. Davis, Treasurer

National Republican Congressional Committee